

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

v.

**HO WAN KWOK,
a/k/a “Miles Guo,”
a/k/a “Miles Kwok,”
a/k/a “Guo Wengui,”
a/k/a “Brother Seven,”
a/k/a “The Principal,”
KIN MING JE,
a/k/a “William Je,” and
YANPING WANG,
a/k/a “Yvette,”
Defendants.,**

Case No. **23 Cr. 118 (AT)**

NOTICE OF APPEARANCE

PLEASE TAKE NOTICE that undersigned counsel, Bradford L. Geyer, of the law firm FormerFedsGroup.Com LLC, hereby enters an appearance as counsel **for 3,345 Himalaya Exchange customers in the above-captioned action.**

Dated: New York, New York
December 6, 2023

Myer and Scher LLP

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*Attorneys for 3,345 Himalaya
Exchange Customers*

Honorable Analisa Torres
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY

March 21, 2025

Your Honor,

We respectfully submit this letter motion on behalf of over approximately 5,242 individual members of the Himalaya Exchange (HEX), who the government itself concedes are innocent victims of the Government seizures (they do not accept they are victims of the offences and or any of the defendants, which is clear from my numerous previous filings).¹

We request that the Honorable Court to:

VACATE WITHOUT PREJUDICE the Preliminary Order of Forfeiture entered on January 7, 2025;

TOLL AND STRIKE the ancillary petition deadline currently set for April 7, 2025;

¹ These 5,242 members of the Himalaya Exchange (HEX) (the only business conducted by Himalaya International Clearing, Ltd., Himalaya International Reserve Ltd [holding HDO reserve that was the subject to the seizure], part of the Exchange group companies. of and in the British Virgin Islands), were authenticated on January 4, 2024 (ECF 212). At that time, HEX confirmed that for 5,242 clients on January 4, 2024, there was a total of \$13,739,075.51 in HCN, \$45,222,849.46 in HDO, based on \$207,067,553.60 in reserves. It will take 2-4 weeks to compile an updated client list with updated clients and losses. Since that time we have had clients terminate the attorney client relationship, while others created one. This is all contained in a secure email account where incoming emails are received from HimalayaRestoration.Com and only identified by a 7 digit Himalaya Identification Number (HID#). This deters hacking and this key can then be used to unlock KYC, identity information, account information and banking information stored and encrypted by HEX. This account has received thousands of emails joining, a few dropping, and in some cases, dropping and rejoining, most times in good faith, but also including separate communications by suspected plants, bad actors and chaos agents.